

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI**

JEFFREY J. O'NEAL - 526473)
(full name) (Register No.))

PRO SE)

PRISONER)

Plaintiff(s).)

v.)

"MR. MALUM")

(Full name))

"ENTER ALIA")

"THE OTHER DEFENDANTS ARE KNOWN - NOT")
Defendant(s). to myself -)

18-3291 - CV - S - BP - P

Case No. _____

Defendants are sued in their (check one):

____ Individual Capacity

____ Official Capacity

☒ Both

COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983

I. Place of present confinement of plaintiff(s): SOUTH "EAST" CORRECTIONAL
CENTER - AN AGENCY OF THE MO. ST. DEPT. OF CORRECTIONS -

II. Parties to this civil action:
Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff JEFFREY J. O'NEAL Register No. 526473
Address 300 E. PEDRO SIMMONS DRIVE - I-B-140 -
CHARLESTON, MO. 63834

B. Defendant "MR. MALUM"

Is employed as A CORRECTIONAL CUSTODY OFFICER - I - BY
MO. ST. DEPT. OF CORRECTIONS @ SOUTH CENTRAL CORR. CENTER

For additional plaintiffs or defendants, provide above information in same format on a separate page.

IN THE 8TH CIRCUIT UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF
THE STATE OF MISSOURI
o o o o

NAME > Jeffrey J. O'Neal -
D.O.C. NO. > 526473 -
AGENCY > SOUTH "EASTERN" CORRECTIONAL CENTER -
ADDRESS > 300 E. PEDRO SIMMONS DR.
WHERE > CHARLESTON, MO. 63834 -

PRO SE Plaintiff Prisoner -

- VS -

& THE MISSOURI STATE DEPARTMENT OF CORRECTIONS -
AGENCY > SOUTH "CENTRAL" CORRECTIONAL CENTER -
ADDRESS > 255 HWY 32
WHERE > LICKING, MO. Id.

II
DEFENDANT > "KNOWN" - JUST NOT TO ME - NOW - OR - @ THE TIME OF THIS
INCIDENT; MY DEFENDANT - I - "MR. MALHAM" KNOWS THIS PERSON -
'INTER ALIA' "WITNESSES" - STATED & NAMED INFRA' o o
EMPLOYED AS > "A SUPERVISOR - CUSTODY OFFICER - II - FOR THE MO. ST. DEPT. OF
CORRECTIONS - "INITIATOR OF THIS CASE"; "EMPLOYED @ THE AGENCY
OF "THE MO. ST. DEPT. OF CORRECTIONS - @ THE AGENCY STATED &
NAMED SUPRA @ ID. ;

DEFENDANT-III - "ARE ALSO KNOWN" BY DEFENDANT-II - MR. MALIK - INTER ALIA -
ARE 8 members of "CERT Team" - Correctional Emergency Response
Team" - "Formerly - E-Squad" ;

Employed as Correctional custody officer's by the MO. ST. DEPT. of
corrections @ THE DEPT. OF CORRECTIONS AGENCY - LISTED &
NAMED @ THE "agency" stated "SUPRA @ Id. ;

••• "DEFENDANTS ARE ALL "PERSONALLY INVOLVED" ••• "BY PHYSICAL
Personal contact" • • • • •

"DEFENDANTS"

WITNESSES > "THERESA - "is what every body call's her - she is easy to
find - "she is a 'correctional case manager @ THE DEPT. of
corrections agency - listed - stated & named @ 'SUPRA Id. on
P. I' ; "MS. THERESA WORKS IN - 'ADMINISTRATIVE SEGREGATION
HOUSING UNIT - II - "ALSO 'NOWS who my II & III - WITNESSES -
ARE AS THEY CONTACTED HER - SHE CONTACTED - "THE OUTSIDE - EMPLOYEE
CONDUCT INVESTIGATOR who CONTACTED MYSELF - told me to file
"my case - THAT THESE defendants "SHOULD NOT HAVE DONE to you
what THEY DONE - THAT my video & Reports - INTER ALIA - ARE
in 'SAFE KEEPING" • "SEEKING PRODUCTION of & INFORMATION
currently" - slow - limited on "POSTAGE" as I AM URMOST EMBIGENT
as this court clearly knows ;

II - > "CAPTAIN - "SHIFT COMMANDER who "CAUGHT THIS on 'Security
video THE NEXT morning DURING HIS 'Security Review' •

III > "my INVESTIGATOR - •

(JURISDICTION & VENUE)

- A - > " THIS PRO SE Plaintiff Prisoner claims and states now - THIS COURT HAS Jurisdiction over THIS case and is Appropriately stated as IT IS THE DISTRICT IN WHICH THIS INCIDENT OCCURED , HAS Jurisdiction under TITLE 28 OF THE UNITED STATES CODE §§ 1331 and 1343 (a)(3) .
- B - > " THIS PRO SE Plaintiff Prisoner ALSO STATES HE "IS SEEKING declaratory relief pursuant to TITLE 28 OF THE UNITED STATES CODE §§ 2201 - 2202" .
- C - > " THE WESTERN DISTRICT UNITED STATES DISTRICT COURT OF THE STATE OF MISSOURI is an appropriate venue under TITLE 28 OF THE UNITED STATES CODE § 1391 (b)(2) because it IS where THE events giving rise to THIS claim occurred " .

III. Do your claims involve medical treatment? Yes ☒ No ☐

IV. Do you request a jury trial? Yes ☒ No ☐

V. Do you request money damages? Yes ☒ No ☐

State the amount claimed? \$ _____ / _____ (actual/punitive)

VI. Are the wrongs alleged in your complaint continuing to occur? Yes ☒ No ☐

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure?

Yes ☒ No ☐

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

Yes ☐ No ☒

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

N/A

D. If you have not filed a grievance, state the reasons.

"IN MO. ST. DEPT. OF CORRECTIONS - C" ALL 26 AGENCIES" YOU "40% OF THE TIME
"CANNOT GET AN "ADMIN. GRIEVANCE" - "THEY ARE GETTING "HARDER TO GET!" "I AM ALSO
BRINGIN' THIS CASE UNDER "CONDITIONS OF CONFINEMENT AND CHALLENGING THE STATE SYST.
ITSELF - "THEREFORE "POST DEPRIVATION REMEDIES - "ARE INADEQUATE UNDER FEDERAL
STATUTE (S) OF LAW."

VIII. Previous civil actions:

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case?

Yes ☐ No ☒

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

Yes ☐ No ☒

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: "PRO SE PRISONER Plaintiff
(Plaintiff) (Defendant)

(2) Date filed: _____

- (3) Court where filed: ' THIS COURT '
- (4) Case Number and citation: 18-4064-CV-NKL-P-
- (5) Basic claim made: 'STAFF INITIATED "ASSAULT & BATTERY"'
- (6) Date of disposition: 4-2-2018 "FILED"
- (7) Disposition: 'PENDING'
(Pending) (on appeal) (resolved)
- (8) If resolved, state whether for: _____
(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

- A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

"I BELIEVE I HAVE ALREADY SENT MY STATEMENT OF CLAIM FOR THIS CASE TO THIS COURT - ATTACHED TO MY "AMENDED COMPLAINT" - STATED - "MALIAM" - IN MY "CASE # 18-4064" - "IF NOT FOUND - "LET ME KNOW" - "I WILL SEND MY COPY" IMMEDIATELY!"

"THIS IS ANOTHER "STAFF INITIATED ASSAULT & BATTERY BY A CUSTODY SUPERVISOR AND B CERT TEAM MEMBERS - ALL CAUGHT ON 3 - CAMERAS - INVESTIGATED BY "OUTSIDE INVESTIGATOR" CAUGHT BY "CAPTAIN - SHIFT COMMANDER (WITNESS) WHO CALLED MY CASEMANAGER

(WITNESS) WHO CALLED THE "INVESTIGATOR" - WHO TOLD ME TO "FILE MY CASE 0000"

- B. State briefly your legal theory or cite appropriate authority:

"BIVENS - 456 F.2d 1339 / KROUSE 471 F.2d 430 @ 81 / Wilson - 501 U.S. @ 303
"SOSTER - 442 F.2d 178 / 100 F.3d 365, 380 / GATES - 376 F.3d 323, 337
"ALBERS - 475 U.S. @ 320 / VANCE - 97 F.3d 987 / 256 F.3d 120

GO > "NOTE - "I CURRENTLY HAVE "NO ACCESS TO "LEGAL ASSISTANCE / LAW LIBRARY" - CITATIONS "FROM "PERSONAL LEGAL MANUALS - CASELAW - "WALDE - 461 U.S. 30, 36

> EX PARTE Young - 209 U.S. 123, 154-160 / BELL - 441 U.S. @ 537-540

MED. - ESTELLE - 429 U.S. @ 104 / JETT - 439 F.3d 1091, 1096 / PIERCE - 612 F.2d 754, 762
> MITCHELL VS HORN - 318 F.3d 523, 536 / JONES - 549 U.S. @ 216

- X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.
DECLARATORY JUDGEMENT - ENJOINING RELIEF / \$10,000 PUNITIVE
Per Defendant - Individually, Jointly, Severally, "IMPRISONMENT" - "ALL
COURT COST PAID, NOMINAL AND "ALL OF DEFENDANTS - "PERSONAL POSSESSIONS" -)
"ALL CARS, HOUSES, BANK ACCOUNTS, SAVINGS, STOCKS, BONDS, PROPERTY, CLOTHES -
XI. Counsel: "EVERYTHING" - "THIS WILL BE THEIR IMPRISONMENT!!" -

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. N/A

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes No /

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted.

N/A "UNABLE TO SEEK - "EFFECTIVELY"
"back'd down - 24/7 - Admin. Seg."

C. Have you previously had a lawyer representing you in a civil action in this court? Yes No /

If your answer is "Yes," state the name and address of the lawyer.

N/A

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this 28TH day of AUGUST 2018

Jerry J. O'Neil - 526473 / 0
Signature(s) of Plaintiff(s)

JEFFREY J. O'NEAL - 526475

C1-B-1401

SOUTH EAST CORRECTIONAL CENTER

300 PEORO SIMMONS DR.

CHARLESTON, MO. 63834

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21 SEP -4 PM 2:40

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(OFFICE OF THE CLERK)
UNITED STATES DISTRICT COURT

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